NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Proposed Approval of Minor Source Operating Permit
for The Andersons Clymers Terminal
in Cass County

MSOP 017-11404, Plt ID 017-00023

Notice is hereby given that the company mentioned above, located at County Roads 300S and 350W, Clymers, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a permit to operate a stationary grain terminal that has grain receiving, drying, cleaning, storage and loading facilities with control. Based on 8,760 hours of operation per year, the potential to emit of PM is 135.14 tons per year.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the Logansport Cass County Public Library, 616 E. Broadway, Logansport, Indiana. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If appropriate adverse comments concerning the **air pollution impact** of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Management (OAM), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Nishat Hydari, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3216.

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

NH/EVP

MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

The Andersons Clymers Terminal
County Roads 300S and 350W
Clymers, Indiana 46947

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 017-11404-00023	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary grain terminal that has grain receiving, drying, cleaning, storage and loading facilities with control.

Authorized Individual:	The Andersons Clymers Terminal
Source Address:	County Roads 300S and 350W, Clymers, Indiana 46947
Mailing Address:	P.O. Box 119, Maumee, Ohio 43537
Phone Number:	(419) 891-2957
SIC Code:	5153
County Location:	Cass
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(1) One truck dump hopper enclosed on 3 sides with particulate emissions controlled by the # 1 baghouse;

(2) One rail/truck dump hopper enclosed on 2 sides with particulate emissions controlled by the # 1 baghouse;

(3) One rail car/truck loading site with no emission controls;

(4) One Berico 3,000 bushel per hour natural gas fired 16.5 million (MM) British thermal units (Btu) per hour burner with screen house enclosure;

(5) One grain cleaner rated at 15,000 bushels per hour with particulate emissions controlled by the # 2 baghouse;

(6) 4 million bushel grain storage capacity with no emission controls;

(7) 400,000 bushel grain storage capacity with particulate emissions controlled by the # 2 baghouse; and

(8) Two 7,500 bushel per hour capacity grain legs with particulate emissions controlled by the # 2 baghouse.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for

New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 NSPS Reporting Requirement

Pursuant to the New Source Performance Standards (NSPS), Part 60.300, Subpart DD, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

(a) Commencement of construction date (no later than 30 days after such date);

(b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

(c) Actual start-up date (within 15 days after such date); and

(d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM OAM. The requirements of 40 CFR Part 60 are also federally enforceable.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of PM is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Maintenance of Monitoring Equipment [IC 13-14-1-13]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Annual Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description
(1) One truck dump hopper enclosed on 3 sides with particulate emissions controlled by the # 1 baghouse;
(2) One rail/truck dump hopper enclosed on 2 sides with particulate emissions controlled by the # 1 baghouse;
(3) One rail car/truck loading site with no emission controls;
(4) One Berico 3,000 bushel per hour natural gas fired 16.5 million (MM) British thermal units (Btu) per hour burner with screen house enclosure;
(5) One grain cleaner rated at 15,000 bushels per hour with particulate emissions controlled by the # 2 baghouse;
(6) 4 million bushel grain storage capacity with no emission controls;
(7) 400,000 bushel grain storage capacity with particulate emissions controlled by the # 2 baghouse; and
(8) Two 7,500 bushel per hour capacity grain legs with particulate emissions controlled by the # 2 baghouse.
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grain dryer (ID No. Berico Dryer) shall not exceed 49.54 pounds per hour when operating at a process weight rate of 84 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (3,000 bu/hr) * (56 lb/bu) * (1 ton/2,000 lb) = 84 tons/hr

$E = 55.0(84^{0.11}) - 40 = 49.54$ lbs/hr

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grain receiving operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)

P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hr) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the internal operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hr) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

(d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the bin loading operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hr) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

(e) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shipping operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.
The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hr) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and its control device.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the grain receiving operation, internal operations (which consists of cleaning) and shipping operation are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**The Anderson Clymers Terminal**
Address:	**County Roads 300S and 350W**
City:	**Clymers, IN 46947**
Phone #:	**(419) 891-2957**
MSOP #:	**017-11404-00023**

I hereby certify that The Andersons Clymers Terminal is **9** still in operation.
9 no longer in operation.

I hereby certify that The Andersons Clymers Terminal is

9 in compliance with the requirements of MSOP **017-11404-00023**.
9 not in compliance with the requirements of MSOP **017-11404-00023**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____
INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND
REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20__ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	The Andersons Clymers Terminal
Source Location:	County Roads 300S and 350W, Clymers, IN 46947
County:	Cass
SIC Code:	5153
Operation Permit No.:	MSOP 017-11404-00023
Permit Reviewer:	Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed an application from The Andersons Clymers Terminal relating to the operation of a grain terminal.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) One truck dump hopper enclosed on 3 sides with particulate emissions controlled by the # 1 baghouse;

(2) One rail/truck dump hopper enclosed on 2 sides with particulate emissions controlled by the # 1 baghouse;

(3) One rail car/truck loading site with no emission controls;

(4) One Berico 3,000 bushel per hour natural gas fired 16.5 million (MM) British thermal units (Btu) per hour burner with screen house enclosure;

(5) One grain cleaner rated at 15,000 bushels per hour with particulate emissions controlled by the # 2 baghouse;

(6) 4 million bushel grain storage capacity with no emission controls;

(7) 400,000 bushel grain storage capacity with particulate emissions controlled by the # 2 baghouse; and

(8) Two 7,500 bushel per hour capacity grain legs with particulate emissions controlled by the # 2 baghouse.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 017-00023, issued on September 16, 1999.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on October 4, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	135.14
PM-10	52.98
SO_2	0.04
VOC	0.40
CO	6.07
NO_x	7.23

(a) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Cass County has been classified as attainment or unclassifiable for PM-10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	65.93
PM10	17.01
SO_2	0.04
VOC	0.40
CO	6.07
NO_x	7.23

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the enissions from this permit MSOP-017-11404-00023, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

(a) The one (1) 4,000 bushel per hour column grain dryer (ID No. Berico Dryer) is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.300, Subpart DD), because it is an affected facility (grain dryer) at a grain terminal elevator that has a permanent storage capacity greater than 2.5 million bushels and was constructed after August 3, 1978. However, none of the provisions of this rule are applicable, per 40 CFR Part 60.302(a), because the grain dryer does not have a column plate perforation exceeding 0.094 inches.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The Andersons Clymers Terminal is subject to the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans) because it has source wide potential emissions of a pollutant (PM) greater than 100 tons per year. Pursuant to this rule, Archer Daniels Midland Company (ADM)/Countrymark shall prepare and submit Emergency Reduction Plans (ERPs) to the Indiana Department of Environmental Management (IDEM), for approval.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) The one (1) 3,000 bushel per hour column grain dryer (ID No. Berico Dryer) is subject to particulate matter limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from the grain dryer shall be limited by the following equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (3,000 bu/hr) * (56 lb/bu) * (1 ton/2,000 lb) = 84 tons/hr

$E = 55.0(84^{0.11}) - 40 = 49.54$ lbs/hr

Potential uncontrolled emissions from the grain dryer (18.48 lbs/hr) are less than the allowable emissions (49.54 lbs/hr), therefore, the one (1) 3,000 bushel per hour column grain dryer (ID No. Berico Dryer) will comply with the requirements of 326 IAC 6-3-2.

(b) The grain receiving operation is subject to particulate matter limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from the grain receiving operation shall be limited by the following equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hr) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

Potential uncontrolled emissions from the grain receiving operation (4.28 lbs/hr) are less than the allowable emissions (40.13 lbs/hr), therefore, the grain receiving operation will comply with the requirements of 326 IAC 6-3-2.

(c) The internal operation (which consist of cleaning) is subject to particulate matter limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from internal operations shall be limited by the following equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hr) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

Potential uncontrolled emissions from the internal operation (5.85 lbs/hr) are less than the allowable emissions (40.13 lbs/hr), therefore, the internal operation will comply with the requirements of 326 IAC 6-3-2.

(d) The bin loading operation is subject to particulate matter limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate matter emissions from the bin loading operation shall be limited by the following equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hrs) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

Potential uncontrolled emissions from the bin loading operation (1.43 lbs/hr) are less than the allowable emissions (40.13 lbs/hr), therefore, the bin loading operation will comply with the requirements of 326 IAC 6-3-2.

(e) The shipping operation is subject to particulate matter limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from the shipping operation shall be limited by the following equation:

$E = 55.0P^{0.11} - 40$ (for process weights in excess of 60,000 lbs/hr)

where E = maximum allowable PM emission rate (lbs/hr)
P = process weight (tons/hr): (268,000 tons/yr) * (1 yr/8,760 hrs) = 30.59 tons/hr

$E = 55.0(30.59^{0.11}) - 40 = 40.13$ lbs/hr

Potential uncontrolled emissions from the shipping operation (0.78 lbs/hr) are less than the allowable emissions (40.13 lbs/hr), therefore, the shipping operation will comply with the requirements of 326 IAC 6-3-2.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of this grain terminal shall be subject to the conditions of the attached proposed **Minor Source Operating Permit MSOP 017-11404-00023.**

Appendix A: Emission Calculations

Company Name: Andersons Clymers Terminal
Address City IN Zip: County Roads 300S and 350W, Clymers, IN 46947
CP: 017-11404
Plt ID: 017-00023
Reviewer: Nishat Hydari

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Column Grain Dryer	Grain Elevator	**TOTAL**
PM	0.14	80.94	54.06	135.14
PM10	0.55	20.24	32.19	52.98
SO2	0.04	0.00	0.00	0.04
NOx	7.23	0.00	0.00	7.23
VOC	0.40	0.00	0.00	0.40
CO	6.07	0.00	0.00	6.07
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Column Grain Dryer	Grain Elevator	**TOTAL**
PM	0.14	59.49	6.30	65.93
PM10	0.55	14.87	1.59	17.01
SO2	0.04	0.00	0.00	0.04
NOx	7.23	0.00	0.00	7.23
VOC	0.40	0.00	0.00	0.40
CO	6.07	0.00	0.00	6.07
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
Grain Elevator
Country Elevator-Small

Company Name: Andersons Clymers Terminal
Adress City IN Zip: County Roads 300S and 350W, Clymers, Indiana 46947
CP: 017-11404
Plt ID: 017-00023
Reviewer: Nishat Hydari

GRAIN TYPE	BUSHELS RECEIVED PER YEAR	BUSHEL WEIGHTS (lb/bu)
Corn:	7,500,000	56
Soybeans:	1,000,000	56
Wheat:	1,000,000	60

State Potential Emissions (uncontrolled):

	GRAIN RECEIVING	INTERNAL OPERATIONS*	BIN LOADING	SHIPPING	**TOTAL**
Maximum Annual Corn Throughput (tons/yr)	210,000	210,000	210,000	210,000	
Maximum Annual Soybean Throughput (tons/yr)	28,000	28,000	28,000	28,000	
Maximum Annual Wheat Throughput (tons/yr)	30,000	30,000	30,000	30,000	
Corn PM Emission Factor in lb/ton	0.1500	0.2050	0.0500	0.0275	
Soybean PM Emission Factor in lb/ton	0.1500	0.2050	0.0500	0.0275	
Wheat PM Emission Factor in lb/ton	0.0600	0.0820	0.0200	0.0110	
Corn PM10 Emission Factor in lb/ton	0.0375	0.2000	0.0125	0.0075	
Soybean PM10 Emission Factor in lb/ton	0.0375	0.2000	0.0125	0.0075	
Wheat PM10 Emission Factor in lb/ton	0.0150	0.0800	0.0050	0.0030	
Corn Dustiness Ratio (DR)	2.5	2.5	2.5	2.5	
Soybean Dustiness Ration (DR)	2.5	2.5	2.5	2.5	
Wheat Dustiness Ratio (DR)	1.0	1.0	1.0	1.0	
Potential PM Emissions (tons/yr)	18.75	25.63	6.25	3.44	54.06
Potential PM10 Emissions (tons/yr)	4.69	25.00	1.56	0.94	32.19

Federal Potential Emissions (controlled):

	GRAIN RECEIVING	INTERNAL OPERATIONS*	BIN LOADING	SHIPPING	**TOTAL**
Potential PM Emissions (tons/yr)	18.75	25.63	6.25	3.44	
Potential PM10 Emissions (tons/yr)	4.69	25.00	1.56	0.94	
Control Equipment (1)	baghouse	baghouse	N/A	baghouse	
Control Efficiency	99.90%	99.90%	0.00%	99.90%	
Controlled PM Emissions (tons/yr)	0.02	0.03	6.25	0.00	6.30
Controlled PM10 Emissions (tons/yr)	0.00	0.03	1.56	0.00	1.59

Note:

* The internal operation emission factor only includes grain cleaning, since that is the only operation performed.

Methodology:

Emission factors are from U.S.EPA's AP-42, Interim Section 9.9.1, 11/95, Table 9.9.1-2 (Interim Uncontrolled Particulate Emission Factors for Grain Elevators)
Maximum Annual Throughput (tons/yr) = Bushels received per year (bu/yr) * Grain Weight (lb/bu) * (1 ton/2000 lbs)
Potential PM/PM10 Emissions (tons/yr) = Annual Throughput (tons/yr) * PM/PM10 Emission Factor (lb/ton) * Dustiness Ratio * (1 ton/2000 lbs)
Controlled PM/PM10 Emissions (tons/yr) = Potential Uncontrolled PM/PM10 Emissions (tons/yr) * (1 - Control Efficiency)

Appendix A: Emissions Calculations
Column Grain Dryer Emission Calculations

Company Name: Andersons Clymers Terminal
Address City IN Zip: County Roads 300S and 350W, Clymers, IN 46947
CP: 017-11404
Plt ID: 017-00023
Reviewer: Nishat Hydari

Emission Calculations for one (1) 3,000 bu/hr column grain dryer:

State Potential Emissions (uncontrolled):						
Dryer Capacity (bu/hr)	Bushel Weight (lbs/bu)	PM Emission Factor (lbs PM/ton) * DR	PM10 Emission Factor (lbs PM10/ton) * DR	Dustiness Ratio (1) (DR) (for mixed grains)	Potential Uncontrolled PM Emissions (tons/yr)	Potential Uncontrolled PM10 Emissions (tons/yr)
3,000	56	0.088	0.022	2.50	80.94	20.24
Federal Potential Emissions (controlled):						
Potential Uncontrolled PM Emissions (tons/yr)	Potential Uncontrolled PM10 Emissions (tons/yr)	Control Device Type:	Capture System Capture Efficiency (%)	Control Device Control Efficiency (%)	Potential Controlled PM Emissions (tons/yr)	Potential Controlled PM10 Emissions (tons/yr)
80.94	20.24	Perforation Plate	n/a	73.50%	59.49	14.87

Methodology:

Emission factors are from U.S.EPA's AP-42, Interim Section 9.9.1, 11/95, Table 9.9.1-2 (Interim Uncontrolled Particulate Emission Factors for Grain Elevators)

Potential Uncontrolled PM/PM10 Emissions (tons/yr) = Dryer Capacity (bu/hr) * Bushel Weight (lbs/bu) * (1 ton/2,000 lbs) * PM/PM10 Emission Factor (lbs PM/ton) * Dustiness Ratio (DR) * (8,760 hrs/yr) * (1 ton/2,000 lbs)

Potential Controlled PM/PM10 Emissions (tons/yr) = Potential Uncontrolled PM/PM10 Emissions (tons/yr) * [1 - (Capture Efficiency * Control Efficiency)]

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas Fired Grain Dryer

Company Name: Andersons Clymers Terminal
Address City IN Zip: County Roads 300S and 350W, Clymers, IN 46947
CP: 017-11404
Plt ID: 017-00023
Reviewer: Nishat Hydari

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
16.5	144.5

Heat Input Capacity includes:
one (1) 3,000 bushel per hour grain dryer.

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.14	0.55	0.04	7.23	0.40	6.07

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).